

EXHIBIT A***Brown v. Google***
Case No. 20-cv-03664-LHK

Dispute No.	Dispute	Court's Ruling
P1 4/7/21	Selection of Google custodians: The parties have a dispute regarding which Google employees to include as document custodians.	<p>The number of custodians will be capped at 42. The deadline to identify the custodians is August 23, 2021.</p> <p>Parties must begin meeting and conferring on search terms without awaiting finalization of custodians. Terms will be agreed to no later than August 23, 2021. If there is any remaining dispute, parties can make a joint submission on August 24, 2021 identifying in table format for each custodian: (1) agreed terms, (2) disputed terms with hit counts, and (3) Google's compromise term or a single-word position as to the proposed term (e.g., overbroad; syntax.)</p> <p>Document productions to be completed in both cases by both sides by October 6, 2021. Productions to be made on a rolling basis.</p>
P2 4/7/21	Google's search terms: The parties have a dispute regarding which search terms Google should apply to identify potentially responsive documents.	See ruling re P1, above.
P3 4/7/21	Google's production of Plaintiffs' data: The parties have a dispute regarding Plaintiffs' RFP No. 18: "Documents concerning Plaintiffs, including Plaintiffs' use of Google services, all data	Referred to the Special Master

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	collected by Google from and regarding Plaintiffs, and Google's use of all data collected by Google from and regarding Plaintiffs."	
P14 5/26/21	Access to non-public Google source code: The parties have a dispute regarding Plaintiffs' requests for access to non-public Google source code.	Referred to Special Master
P15 5/26/21	Cross-use: The parties have a dispute regarding cross-use of discovery between <i>Brown</i> and <i>Calhoun</i> .	The Court will issue a cross-use order incorporating the terms discussed at the hearing.
P17 8/2/21	Depositions: The parties have a dispute about the timing and number of depositions.	<p>The Court adopts the Plaintiffs' position as set forth at page 28 of Dkt. 228-4, requiring Google to: (1) provide available dates within one week of receiving any deposition notice, and (2) offer dates within five weeks of any deposition notice. The noticing party must confirm dates with 48 hours.</p> <p>The Court will allow Plaintiffs to take a total of 20 depositions in each case. This number includes joint depositions and Rule 30(b)(6) depositions. Each 7-hours of a 30(b)(6) deposition shall count as one deposition toward the limit. 30(b)(6) depositions taken pursuant to this Court's prior orders do not count toward this limit.</p>